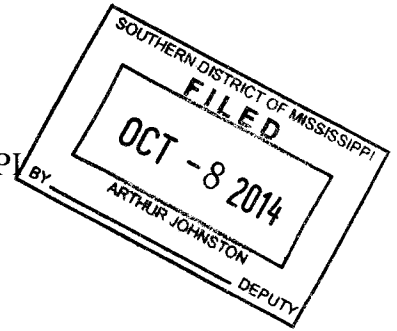


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:14cr126 FKB

AUDREY LASHAY TILLMAN

18 U.S.C. § 1952(a)(3)

18 U.S.C. § 924(a)(1)(7)(c)(1)(A)(i)

The United States Attorney charges:

COUNT 1

That on or about June 14, 2014, in the Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **AUDREY LASHAY TILMAN**, used and caused to be used a facility in interstate commerce, to wit: the Internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of a crime of violence, that is, Title 18, United States Code, Section 1591(a)(1)(2)(b)(2), and an unlawful activity, that is, Human Sex Trafficking, and thereafter performed and attempted to perform an act, to wit: posting an advertisement, Post ID 5773629, for commercial sex acts on the website "backpage.com", to promote, manage establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

All in violation of Sections 1952(a)(3) and 2, Title 18, United States Code.

COUNT 2

That on or about June 19, 2014, in Madison County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **AUDREY LASHAY TILLMAN**, did knowingly use and carry a firearm during and in relation to a crime of violence

for which she may be prosecuted in a Court of the United States, that is, Human Sex Trafficking to Promote Prostitution, in violation of Section 1591, Title 18, United States Code, as charged in Count One of this Information.

All in violation of Sections 924(a)(1)(7)(c)(1)(A)(i) and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE


As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense.

The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offense alleged in this indictment:

One Smith and Wesson 9mm, Model 459, Serial No. A734515 and ammunition.

Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 924(d), Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney